

Robert A. Mantel
RMantel@crowell.com
(212) 590-5439 direct

Crowell & Moring LLP
Two Manhattan West
375 9th Avenue
New York, NY 10001
+1.212.223.4000 main
+1.212.223.4134 fax

VIA ECF

April 15, 2024

Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

We represent Plaintiffs in the above-referenced matter and submit this joint letter on behalf of both parties. Pursuant to the Court's Order dated April 11, 2024, we write to update the Court regarding whether Plaintiffs intend to file an amended complaint and a proposed schedule for Defendants' motion to dismiss.

Plaintiffs do intend to file an amended complaint, and the parties jointly propose the following schedule:

- Amended Complaint due no later than **April 26, 2024**
- Defendants' motion to dismiss, if any, due no later than **May 17, 2024**
- Plaintiffs' opposition papers due no later than **May 31, 2024**
- Defendants' reply papers due no later than **June 7, 2024**.

Respectfully submitted,

/s/ Robert A. Mantel
Robert A. Mantel

/s/ Daniel R. Perez
Daniel R. Perez

CROWELL & MORING LLP

Joshua Sohn
Robert A. Mantel
Daniella A. Schmidt
Hinako Gojima
Two Manhattan West
375 Ninth Avenue
New York, NY 10001
Tel: (212)590-5442
rmantel@crowell.com

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel of the City of New York
Daniel R. Perez
100 Church Street
New York, NY 10007
Tel: (212) 356-0877
danipere@law.nyc.gov

Counsel for Defendants

April 15, 2024

BROOKLYN DEFENDER SERVICES

Jessica Marcus

Lauren Shapiro

Lucas Marquez

Kevin Siegel

177 Livingston St, 7th Floor

Brooklyn, NY 11201

Tel: (347) 592-2518

jmarcus@bds.org

Counsel for Plaintiffs